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Cunningham, Q.C., as court-appointed  
litigation trustee for the Canadian Debtors, and  
Counsel for 1291079 Ontario Limited, as class  
representative for the potential class of Sears Hometown Dealer  
stores*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re*

SEARS HOLDINGS CORPORATION., *et al.*,

Debtors.

Chapter 11

**Case No. 18-23538 (RDD)**

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby appear in the above-captioned cases on behalf of the Honourable J. Douglas Cunningham, Q.C., in his capacity as the court-appointed litigation trustee for the Canadian Debtors,<sup>1</sup> and 1291079 Ontario Limited, as the class representative for the potential class of Sears Hometown Dealer stores, pursuant to 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010, and request

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1. The Canadian Debtors are: Sears Canada; 9370-2751 Quebec Inc.; 191020 Canada Inc.; The Cut Inc.; Sears Contact Services Inc.; Initium Logistics Services Inc.; 9845488 Canada Inc.; Initium Trading and Sourcing Corp.; Sears Floor Covering Centres Inc.; 173470 Canada Inc.; 2497089 Ontario Inc.; 6988741 Canada Inc.; 10011711 Canada Inc.; 1592580 Ontario Limited; 955041 Alberta Ltd.; 4201531 Canada Inc.; 168886 Canada Inc.; and 3339611 Canada Inc.

that copies of all notices and papers filed or entered in these cases also be served, electronically or otherwise, on:

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**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 3017(a), this request includes not only the notices and papers referred to in the provisions specified above, but also includes any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement, and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that is filed or given in connection with these cases and the proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall waive (i) any right to have any matter or proceeding for which a bankruptcy court lacks the authority to enter a final order or judgment without the consent of the parties adjudicated by an Article III court, (ii) any right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) any right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) an election of remedies, or (v) any other substantive or procedural right.

**PLEASE TAKE FURTHER NOTICE** that the aforementioned attorneys request that they be added to the official service list for notice of all contested matters, adversary proceedings and other proceedings in these cases.

Dated: April 16, 2019  
New York, New York

**HUGHES HUBBARD & REED LLP**

By: /s/ Dustin P. Smith

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for the potential class of Sears Hometown Dealer  
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